

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Newport News Division**

KEVIN REAGAN,
Plaintiff,

v.

Civil Action No. 4:23-cv-158

JOHN RATCLIFFE, Director,
Central Intelligence Agency,
Defendant.

DEFENDANT'S MOTION TO DISMISS PLAINTIFF'S AMENDED COMPLAINT

Defendant, John Ratcliffe, Director, Central Intelligence Agency, respectfully moves to dismiss Plaintiff's Amended Complaint (ECF No. 60) for failure to state a claim pursuant to Federal Rule of Civil Procedure 12(b)(6). The grounds for Defendant's Motion are set forth in Defendant's accompanying Memorandum of Law, which is incorporated herewith.

Respectfully submitted,

JOHN RATCLIFFE, Director
Central Intelligence Agency

ERIK S. SIEBERT
United States Attorney

By: /s/ Daniel P. Shean

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